

Indiana Department of Environmental Management

We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan Governor

Lori F. Kaplan Commissioner

January 27, 2004

100 North Senate Avenue P.O. Box 6015 Indianapolis, Indiana 46206-6015 (317) 232-8603 (800) 451-6027 www.in.gov/idem

TO: Interested Parties / Applicant

RE: Dutchman Manufacturing, Inc. / 039-18611-00380

FROM: Paul Dubenetzky

Chief, Permits Branch Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, within eighteen (18) calendar days from the mailing of this notice. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- the date the document is delivered to the Office of Environmental Adjudication (OEA); (1)
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- The date on which the document is deposited with a private carrier, as shown by receipt issued by (3)the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- the name and address of the person making the request; (1)
- (2) the interest of the person making the request:
- (3) identification of any persons represented by the person making the request;
- the reasons, with particularity, for the request; (4)
- the issues, with particularity, proposed for considerations at any hearing; and (5)
- identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

> Enclosures FNPER-AM.dot 9/16/03



Mr. Richard W. Florea Dutchmen Manufacturing, Inc. 2164 Caragana Ct. Goshen, IN 46526

Re: 039-18611

Notice-only change to MSOP 039-11784-00380

Dear Mr. Florea:

Dutchmen Manufacturing was issued an MSOP on May 26, 2000, for a stationary travel trailer manufacturing source. A letter notifying the Office of Air Quality of some changes was received on January 7, 2004. The changes are related to:

- (1) A change in mailing address of the responsible official and owner.
- (2) Addition of emission units due to relocation of Middlebury Lite final finish process, including woodworking and surface coating facilities.

According to 326 IAC 2-6.1-6(d)(2), a notice-only change can be issued for "minor administrative changes such as change in the name address, or telephone number of any person identified in a permit or a change in descriptive information". Also, according to 326 IAC 2-6.1-6(d)(13), a notice-only change is appropriate for "a modification that adds an emission unit or units of the same type that are already permitted and that will comply with the same applicable requirements and permit terms and conditions as the existing emission unit or units, except if the modification would result in a potential to emit greater than the thresholds in 326 IAC 2-2 or 326 IAC 2-3".

The requested changes meet the above requirement, therefore, pursuant to the provisions of 326 IAC 2-6.1-6 the permit is hereby revised as follows (strikeout to show deletions and **bold** to show additions):

(1) Section A.1 is modified as follows:

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary travel trailer manufacturing source.

Authorized Individual: Richard W. Florea

Source Address: 305 Steury Avenue, Goshen, Indiana 46526

Mailing Address: 305 Steury Avenue, Goshen, Indiana 46526 2164 Caragana Ct.,

Goshen, IN 46526

Phone Number: 219 574 - 534 - 1224

SIC Code: 3792 County Location: Elkhart

- (2) Section A.2 is modified as follows:
 - (r) One (1) inside above ground storage tank, capacity: 250 gallons of hydraulic oil.

- Page 2 of 4 Notice-Only Change No.: 039-18611-00380
- (s) One (1) outside above ground storage tank, installed in 1991, capacity: 250 gallons of diesel fuel.
- (t) Two (2) outside above ground storage tanks, installed in 1991, capacity: 300 gallons of unleaded gasoline each.

Middlebury Lite Final Finish

- (u) One (1) painting area where travel trailers' cabinets, walls, prefinished and assembled campers are coated using aerosol cans, with a capacity of 1.125 units per hour. There are no exhaust stack; and
- (v) Woodworking operation, with a maximum throughput of 828.966 pounds per hour, luan is 131.170 pounds per hour and plywood is 524.565 pounds per hour. This operation consists of the following equipment:
 - (1) Nine (9) chop saw
 - (2) Two (2) table saws
 - (3) One (1) belt sander
 - (4) One (1) router
 - (5) One (1) band saw
 - (6) One (1) drill press
 - (7) Two (2) radial arm saws
 - (8) One (1) grinder
 - (9) One (1) plasma cutter
 - (10) One (1) baghouse
 - (11) One (1) cyclone
- (w) One (1) dust collector, identified as M-P5.
- (x) Two (2) portable baghouses as back-up pollution control equipment, identified as M-P6 and M-P7.
- (3) The facility description in Section D.1 is modified as follows:

Final Finish Building

Finished Travel Trailers

- (f) One (1) woodworking and surface coating operation, equipped with a cyclone, known as P3, and one (1) stand-by baghouse, known as P4, exhausting through vents V3 through V5, throughput: 18.0 pounds of wood per hour and 9.0 pounds of panelboard per hour, capacity: 1.2 travel trailers per hour.
- (g) Woodworking operations consist of: one (1) chop saw and (1) radial arm saw.

Middlebury Lite Final Finish

- (h) One (1) painting area where travel trailers' cabinets, walls, prefinished and assembled campers are coated using aerosol cans, with a capacity of 1.125 units per hour. There are no exhaust stack; and
- (i) Woodworking operation, with a maximum throughput of 828.966 pounds per hour, luan is 131.170 pounds per hour and plywood is 524.565 pounds per hour. This operation consists of the following equipment:

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- (1) Nine (9) chop saw
- (2) Two (2) table saws
- (3) One (1) belt sander
- (4) One (1) router
- (5) One (1) band saw
- (6) One (1) drill press
- (7) Two (2) radial arm saws
- (8) One (1) grinder
- (9) One (1) plasma cutter
- (10) One (1) baghouse
- (11) One (1) cyclone
- (j) One (1) dust collector, identified as M-P5.
- (k) Two (2) portable baghouses as back-up pollution control equipment, identified as M-P6 and M-P7.
- (4) Section D.1.4 is modified as follows:
 - D.1.4 Particulate Matter (PM) [326 IAC 6-3-2(c)]
 - (a) The PM from the surface coating operations shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$
 where $E =$ rate of emission in pounds per hour; and $P =$ process weight rate in tons per hour

- (b) Woodworking
 - (1) Cyclones

The PM from the woodworking operations associated with cyclones P1, P2 and P3 shall not exceed 2.95, 2.95 and 0.551 pounds per hour, respectively, when operating at process weight rates of 1,224, 1,224 and less than 100 pounds per hour.

(2) Back-up Baghouses

The back-up baghouses, known as P4, **M-P6, and M-P7** shall meet the allowable PM emission limit calculated with the following:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10 P^{0.67}$$
 where $E =$ rate of emission in pounds per hour, and $P =$ process weight rate in tons per hour.

(3) The PM emissions from the Middlebury Lite Line's woodworking operation shall not exceed 0.37 pounds per hour for a process weight rate of 56 pounds per hour.

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- (5) Section D.1.6 is modified as follows:
 - D.1.6 Particulate Matter (PM)
 - (1) The cyclones, known as P1, P2 and P3, or the back-up baghouses, known as P4 for PM control shall be in operation at all times when the woodworking facilities at the assembly building or final finish building are in operation.
 - (2) The dust collector, known as M-P5, or the back-up baghouses, known as M-P6 and M-P7 shall be in operation at all times when the Middlebury Lite woodworking facilities are in operation.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this letter and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik at (800) 451-6027, press 0, extension 3-0868, or dial (317) 233-0868.

Sincerely,

Original signed by Paul Dubenetzky

Paul Dubenetzky, Chief Permits Branch Office of Air Quality

Attachments

mm

cc: File - Elkhart County

U.S. EPA, Region V

Elkhart County Health Department

Northern Regional Office

Air Compliance Section Inspector – Paul Karkiewicz

Compliance Data Section

Administrative and Development

NEW SOURCE CONSTRUCTION PERMIT and MINOR SOURCE OPERATING PERMIT OFFICE OF AIR QUALITY

Dutchmen Manufacturing, Inc. 305 Steury Avenue Goshen, Indiana 46526

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

This permit is also issued under the provisions of 326 IAC 2-2, 40 CFR 52.21, and 40 CFR 52.124 (Prevention of Significant Deterioration), with conditions listed on the attached pages.

This permit is also issued under the provisions of 326 IAC 2-3 (Emission Offset), with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-11784-00380	
Issued by: Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: May 26, 2000

1" Notice-Only Change No.: 039-18611	Pages Modified: 4, 5, 6, 18, 18a, 20, 20a
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 27, 2004

1st Notice-Only Change No.: 039-18611 Modified By: Madhurima D. Moulik

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

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MSOP No.: 039-11784-00380

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary travel trailer manufacturing source.

Authorized Individual: Richard W. Florea

Source Address: 305 Steury Avenue, Goshen, Indiana 46526 Mailing Address: 2164 Caragana Ct., Goshen, Indiana 46526

Phone Number: 574 - 534 - 1224

SIC Code: 3792 County Location: Elkhart

County Status: Attainment for all criteria pollutants
Source Status: Minor Source Operating Permit
Minor Source, under PSD Rules;

Minor Source, Section 112 of the Clean Air Act

Emissions Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emissions units and pollution control devices:

Assembly Building

A.2

(a) Woodworking operations consist of: three (3) band saws, one (1) chop saw, one (1) drill press, three (3) grinder benches, eighteen (18) mitre saws, one (1) double mitre saw, three (3) radial arm saws, two (2) routers, three (3) table saws and one (1) belt sander.

Chassis Frame with Floor Preparation

(b) One (1) woodworking and surface coating operation, equipped with a cyclone, P1, exhausting through vents V1 and V2, throughput: 1,125 pounds of preassembled frames per hour, 126 pounds of plywood per hour and 144 pounds of panelboard per hour, capacity: 1.2 travel trailers per hour.

Cabinets and Mill

(c) One (1) woodworking and surface coating operation, equipped with two (2) cyclones, known as P1 and P2, exhausting through vents V1 and V2, throughput: 154.8 pounds of wood per hour, 626.4 pounds of panelboard per hour, 43.2 pounds of plywood per hour, and 216 pounds of stiles per hour, capacity: 1.2 travel trailers per hour.

Slide-Out Assembly and Installation

(d) One (1) woodworking and surface coating operation, equipped with two (2) cyclones, known as P1 and P2, exhausting through vents V1 and V2, throughput: 28.8 pounds of Luan per hour, 356.4 pounds of wood per hour, 82.8 pounds of panelboard per hour and 28.8 pounds of plywood per hour, capacity: 1.2 travel trailers per hour.

1st Notice-Only Change No.: 039-18611 Modified By: Madhurima D. Moulik

Prefinished Travel Trailers (Unit Assembly) Operation

(e) One (1) woodworking and surface coating operation, equipped with two (2) cyclones, known as P1 and P2, exhausting through vents V1 and V2, throughput: 432 pounds of wood per hour, 82.8 pounds of panelboard per hour and 126 pounds of plywood per hour, capacity: 1.2 travel trailers per hour.

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Final Finish Building

Finished Travel Trailers

- (f) One (1) woodworking and surface coating operation, equipped with a cyclone, known as P3, and one (1) stand-by baghouse, known as P4, exhausting through vents V3 through V5, throughput: 18.0 pounds of wood per hour and 9.0 pounds of panelboard per hour, capacity: 1.2 travel trailers per hour.
- (g) Woodworking operations consist of: one (1) chop saw and (1) radial arm saw.

Welding

- (h) One (1) MIG welding station, capacity: .354 pounds of wire per hour.
- (i) Two (2) stick welding stations, capacity: 1.0 and 7.0 electrodes per hour.
- (j) One (1) oxyacetylene flame cutting station, capacity: 0.167 inches per minute at a thickness of 0.375 inches.

Stick and Tin Assembly Building

- (k) Six (6) radiant heaters, known as H1 through H5, H13, rated at 0.150 million British thermal units per hour each, exhausting through stacks H1 H5 and H13 (formally known as H-14).
- (I) Three (3) space heaters, known as H6 through H8, rated at 0.100 million British thermal units per hour each, exhausting through stacks H6 H8.
- (m) Four (4) space heaters, known as H9 through H12, rated at 0.225 million British thermal units per hour each, exhausting through stacks H9 H11.
- (n) Seven (7) space heaters, known as H14 through H20 (formally known as H1 H7), rated at 0.100 million British thermal units per hour each, exhausting through stacks H14 through H20.
- (o) Seven (7) space heaters, known as H21 through H27 (formally known as H8 H14), rated at 0.225 million British thermal units per hour each, exhausting through stacks H21 H27.
- (p) Two (2) radiant heaters, known as H28 and H29 (formerly known as H15 and H16), rated at 0.150 million British thermal units per hour each, exhausting through stacks H28 and H29.
- (q) One (1) inside tote, installed in 1993, capacity: 330 gallons of adhesive.
- (r) One (1) inside above ground storage tank, capacity: 250 gallons of hydraulic oil.
- (s) One (1) outside above ground storage tank, installed in 1991, capacity: 250 gallons of diesel fuel.
- (t) Two (2) outside above ground storage tanks, installed in 1991, capacity: 300 gallons of unleaded gasoline each.

1st Notice-Only Change No.: 039-18611 Modified By: Madhurima D. Moulik

Middlebury Lite Final Finish

(u) One (1) painting area where travel trailers' cabinets, walls, prefinished and assembled campers are coated using aerosol cans, with a capacity of 1.125 units per hour. There are no exhaust stack; and

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- (v) Woodworking operation, with a maximum throughput of 828.966 pounds per hour, luan is 131.170 pounds per hour and plywood is 524.565 pounds per hour. This operation consists of the following equipment:
 - (1) Nine (9) chop saw
 - (2) Two (2) table saws
 - (3) One (1) belt sander
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 - (5) One (1) band saw
 - (6) One (1) drill press
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 - (8) One (1) grinder
 - (9) One (1) plasma cutter
 - (10) One (1) baghouse
 - (11) One (1) cyclone
- (w) One (1) dust collector, identified as M-P5.
- (x) Two (2) portable baghouses as back-up pollution control equipment, identified as M-P6 and M-P7.

1st Notice-Only Change No.: 039-18611 Modified By: Madhurima D. Moulik

EMISSION UNIT OPERATION CONDITIONS

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MSOP No.: 039-11784-00380

Emissions Unit Description:

Assembly Building

SECTION D.1

(a) Woodworking operations consist of: three (3) band saws, one (1) chop saw, one (1) drill press, three (3) grinder benches, eighteen (18) mitre saws, one (1) double mitre saw, three (3) radial arm saws, two (2) routers, three (3) table saws and one (1) belt sander.

Chassis Frame with Floor Preparation

(b) One (1) woodworking and surface coating operation, equipped with a cyclone, P1, exhausting through vents V1 and V2, throughput: 1,125 pounds of preassembled frames per hour, 126 pounds of plywood per hour and 144 pounds of panelboard per hour, capacity: 1.2 travel trailers per hour.

Cabinets and Mill

(c) One (1) woodworking and surface coating operation, equipped with two (2) cyclones, known as P1 and P2, exhausting through vents V1 and V2, throughput: 154.8 pounds of wood per hour, 626.4 pounds of panelboard per hour, 43.2 pounds of plywood per hour, and 216 pounds of stiles per hour, capacity: 1.2 travel trailers per hour.

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(d) One (1) woodworking and surface coating operation, equipped with two (2) cyclones, known as P1 and P2, exhausting through vents V1 and V2, throughput: 28.8 pounds of Luan per hour, 356.4 pounds of wood per hour, 82.8 pounds of panelboard per hour and 28.8 pounds of plywood per hour, capacity: 1.2 travel trailers per hour.

Prefinished Travel Trailers (Unit Assembly) Operation

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Final Finish Building

Finished Travel Trailers

- (f) One (1) woodworking and surface coating operation, equipped with a cyclone, known as P3, and one (1) stand-by baghouse, known as P4, exhausting through vents V3 through V5, throughput: 18.0 pounds of wood per hour and 9.0 pounds of panelboard per hour, capacity: 1.2 travel trailers per hour.
- (g) Woodworking operations consist of: one (1) chop saw and (1) radial arm saw.

Middlebury Lite Final Finish

- (h) One (1) painting area where travel trailers' cabinets, walls, prefinished and assembled campers are coated using aerosol cans, with a capacity of 1.125 units per hour. There are no exhaust stack; and
- (i) Woodworking operation, with a maximum throughput of 828.966 pounds per hour, luan is 131.170 pounds per hour and plywood is 524.565 pounds per hour. This operation consists of the following equipment:

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

1st Notice-Only Change No.: 039-18611 Page 18a of 27 Modified By: Madhurima D. Moulik MSOP No.: 039-11784-00380

SECTION D.1

EMISSION UNIT OPERATION CONDITIONS (continued)

Emissions Unit Description:

Middlebury Lite Final Finish (Continued)

- (1) Nine (9) chop saw
- (2) Two (2) table saws
- (3) One (1) belt sander
- (4) One (1) router
- (5) One (1) band saw
- (6) One (1) drill press
- (7) Two (2) radial arm saws
- (8) One (1) grinder
- (9) One (1) plasma cutter
- (10) One (1) baghouse
- (11) One (1) cyclone
- (j) One (1) dust collector, identified as M-P5.
- (k) Two (2) portable baghouses as back-up pollution control equipment, identified as M-P6 and M-P7.

(The information describing the process contained in this emissions unit description box is descriptive information and does not constitute enforceable conditions.)

1st Notice-Only Change No.: 039-18611 Modified By: Madhurima D. Moulik

 $E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour and P = process weight rate in tons per hour

(2) Back-up Baghouses

The back-up baghouses, known as P4, M-P6, and M-P7 shall meet the allowable PM emission limit calculated with the following:

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Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

 $E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour, and P = process weight rate in tons per hour.

(3) The PM emissions from the Middlebury Lite Line's woodworking operation shall not exceed 0.37 pounds per hour for a process weight rate of 56 pounds per hour.

Compliance Determination Requirements [326 IAC 2-1.1-11]

D.1.5 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance with the PM limits specified in Condition D.1.4 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.6 Particulate Matter (PM)

- (1) The cyclones, known as P1, P2 and P3 or the back-up baghouse, known as P4, for PM control shall be in operation at all times when the woodworking facilities at the assembly building or the final finish building are in operation.
- (2) The dust collector, known as M-P5, or the back-up baghouses, known as M-P6 and M-P7 shall be in operation at all times when the Middlebury Lite woodworking facilities are in operation.

Compliance Monitoring Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.7 Visible Emissions Notations

- (a) Daily visible emission notations of the cyclones and/or back-up baghouse stack exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed.

1st Notice-Only Change No.: 039-18611 Modified By: Madhurima D. Moulik Page 20a of 27 MSOP No.: 039-11784-00380

D.1.8 Baghouse Inspections

An inspection shall be performed each calender quarter of all bags controlling the woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting to the indoors. All defective bags shall be replaced.